

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

IN RE: CENTURLINK SALES  
PRACTICES AND SECURITIES  
LITIGATION

MDL No. 17-2795 (MJD/KMM)

This Document Relates to:  
Civil File No. 18-296 (MJD/KMM)

**PLAINTIFFS' MOTION TO COMPEL DISCOVERY**

Pursuant to Federal Rules of Civil Procedure 37, Plaintiffs, the State of Oregon by and through the Oregon State Treasurer and the Oregon Public Employee Retirement Board, on behalf of the Oregon Public Employee Retirement Fund, and Fernando Alberto Vildosola, as trustee for the AUFV Trust U/A/D 02/19/2009, by their counsel, hereby move this Court for an Order compelling: (i) production of documents previously produced to the Minnesota Attorney General in the response to the eight requests at issue in the Attorney General's Third Motion to Compel filed in the state court case, *State of Minnesota v. CenturyTel*, No. 02-CV-17-3488 (Minn. Dist. Ct., 10th Jud. Dist., Anoka Cty.); (ii) supplemental disclosures to Plaintiffs' Interrogatory No. 2 concerning the other state attorney general investigations into CenturyLink's billing misconduct; (iii) production of documents previously produced to other state attorneys general identified by the parties' agreed-upon search terms; and (iv) CenturyLink to include as a document custodian and conduct a search using agreed-upon search terms of its "Integrity Line" email address.

This Motion is based on this Notice of Motion, accompanying Memorandum of Law in Support of Plaintiffs' Motion to Compel Discovery, the Declaration of Michael D. Blatchley with supporting exhibits A to CC ("Blatchley Decl."), the papers and pleadings filed in this action, and such further argument and matters as may be offered at the time of hearing on this Motion.

Dated: February 25, 2020

Respectfully submitted,

/s/ Michael D. Blatchley

Michael D. Blatchley, NYS Bar No. 4747424

Michael M. Mathai, NYS Bar No. 5166319

**BERNSTEIN LITOWITZ BERGER &  
GROSSMANN LLP**

1251 Avenue of the Americas

New York, New York 10020

Telephone: (212) 554-1400

Facsimile: (212) 554-1444

michaelb@blbglaw.com

michael.mathai@blbglaw.com

Keith S. Dubanevich, OSB No. 975200

Timothy S. DeJong, OSB No. 940662

Keil M. Mueller, OSB No. 085535

Lydia Anderson-Dana, OSB No. 166167

**STOLL STOLL BERNE LOKTING &  
SHLACHTER P.C.**

209 SW Oak Street, Suite 500

Portland, OR 97204

Telephone: (503) 227-1600

Facsimile: (503) 227-6840

kdubanevich@stollberne.com

tdejong@stollberne.com

kmueller@stollberne.com

landersondana@stollberne.com

*Special Assistant Attorneys General and  
Counsel for Lead Plaintiff the State of Oregon  
by and through the Oregon State Treasurer and*

*the Oregon Public Employee Retirement Board, on behalf of the Oregon Public Employee Retirement Fund and Plaintiff Fernando Alberto Vildosola, as trustee for the AUFV Trust U/A/D 02/19/2009, and Lead Counsel for the Class*

Gregg M. Fishbein, MN No. 202009  
Kate M. Baxter-Kauf, MN No. 392037  
**LOCKRIDGE GRINDAL NAUEN P.L.L.P.**  
100 Washington Avenue S, Suite 2200  
Minneapolis, MN 55401  
Telephone: (612) 596-4044  
Facsimile: (612) 339-0981  
gmfishbein@locklaw.com  
kmbaxter-kauf@locklaw.com

*Liaison Counsel for Plaintiffs*